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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,
14 v.
15 AKILA CHAPPELL-HERSH,
16 Defendant.

Case No. 2:20-cr-00089-GMN-EJY

**STIPULATION TO MODIFY
CONDITIONS OF RELEASE**
(First Request)

(Expedited Treatment Requested)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Brett Ruff, Assistant
18 United States Attorney, counsel for the United States of America, and Raquel Lazo, Assistant
19 Federal Public Defender, counsel for Akila Chappell-Hersh, that the Court modify his
20 conditions of release.

21 The Stipulation is entered into for the following reasons:

22 1. On May 13, 2020, the Court ordered Mr. Chappell's release on a personal
23 recognizance bond with certain conditions, including a travel restriction to Clark County,
24 Nevada. ECF No. 8.

25 2. On November 19, 2020, Mr. Chappell pleaded guilty pursuant to a plea
26 agreement. He was continued on his current terms of supervision. ECF No. 34. Prior to his

1 hearing, Mr. Chappell had consulted with his Pretrial Services officer regarding his desire to
2 travel to Southern California for his brother's funeral. He was advised by his officer that he
3 needed to request permission to travel from the Court. Mr. Chappell neglected to bring the
4 matter to defense counsel's attention until after the plea hearing.

5 3. Mr. Chappell wishes to travel to Southern California for his brother's funeral
6 from November 23-24, 2020.

7 4. Defense counsel has spoken with Pretrial Services concerning this issue. Pretrial
8 Services confirmed to defense counsel that Mr. Chappell has been compliant with the terms of
9 his release. Pretrial Services has no opposition as long as Mr. Chappell supplies them with his
10 travel itinerary and the address where he will be staying while in California.

11 5. The government has no objection to this requested modification.

12 6. This matter is being requested on an expedited basis because the proposed travel
13 is this weekend.

14 This is the first stipulation to modify conditions of release filed herein.

15 DATED this 19th day of November, 2020.

16 RENE L. VALLADARES
17 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

18 By /s/ Raquel Lazo

By /s/ Brett Ruff

19 RAQUEL LAZO
20 Assistant Federal Public Defender

BRETT RUFF
Assistant United States Attorney

ORDER

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